

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT

IN RE: DEQUAN BOTSWANA THOMAS

17-53017
JUDGE: RANDON
Chapter 13

ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

Debtor answers

1. The Debtor admits this allegation.
2. The Debtor admits this allegation.
3. The Debtor admits this allegation.
4. The Debtor admits this allegation
5. The Debtor neither admits nor denies this allegation.
6. The Debtor admits this allegation.
7. The Debtor neither admits nor denies this allegation.
8. The Debtor admits this allegation.
9. The Debtor admits this allegation.
10. The Debtor admits this allegation.
11. The Debtor denies this allegation. The Debtor will catch up on any missed payments.
12. The Debtor denies this allegation. The Debtor will catch up on any missed payments.
13. The Debtor denies this allegation. The Debtor will catch up on any missed payments.

14. The Debtor admits this allegation.

Wherefore, the Debtor requests that this motion be dismissed.

/s/ Marshall D. Schultz
Marshall D. Schultz (P38040)
Amy K. Trainor (P68589)
Attorney for Debtor(s)
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248-559-6930

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PROOF OF SERVICE

I, Marshall D. Schultz, hereby swear under penalty of perjury, that on the date indicated below, I did serve copies of all the following documents filed in the above captioned case:

1. ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

on the following parties, by mailing said copies by first class U.S. mail with fully prepaid postage affixed, addressed to each of said parties as follows or by electronic means, if applicable:

Krispen S. Carroll
Chapter 13 Trustee
719 Griswold
1100 Dime Building
Detroit, MI 48226

Kilpatrick & Associates, PC
615 Griswold, Suite 1305
Detroit, MI 48226

Dated: October 23, 2020

/s/ Marshall D. Schultz
Marshall D. Schultz (P38040)
Amy K. Trainor (P68589)
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